

Pomes, Michael

From: Robert Trump <rtrump@totalpetroleumservices.com>
Sent: Wednesday, December 07, 2016 10:39 AM
To: Drouare, Douglas; Sac & Fox Truck Stop
Cc: robwandrew@mac-const.com; Chris Kinn; Anita Ketola; Kelly Cratsenburg
Subject: RE: Powhattan Schedule [WARNING: SPF validation failed]

Categories: EZ Record - Shared

Good Morning Mr. Drouare,

Soil Vapor Monitoring: Originally we did not want to do the monitoring until the source of contaminate was removed from the site. That would have included additional water, back fill, and the tank(s). It was our thought that we would reduce the expenses necessary in travel and on site if we could conduct the full evaluation in one mobilization. However, it appears we may only be able to remove the tank(s) which may not allow for removal of water and backfill to sufficiently conduct PID readings throughout the tank pit if weather conditions do not allow for full excavation of contaminated materials at this time. The owner of the site has indicated they will not install the new tanks until matters pertaining to insurance can be sufficiently resolved. However, this does not minimize the efforts to further remove contaminants as they are committed to satisfying all remedial efforts without any financial assistance from insurance and will work to resolve those at a later date. If you still feel as strongly about the Soil Vapor monitoring as indicated in an earlier correspondence we will continue with that as planned.

Please advise on this point.

Work to Be Done: We certainly understand and agree that this project must be done and you are right we must pick and choose the days which allow the work to be completed. Right now the damaged tank is completely full of water and another 67" in the observation well from within the tank pit. When the first uncovering of the tanks was conducted we started at 124" of water in the observation well and lowered to under 7" in the well which kept recharging. This did allow for personnel to enter the tank for examination. We disposed of approximately 63,000 gallons from that event. As you know we can attempt to remove all the water from the observation well and what is in the tank, or we can attempt to remove water at a rate from within the tank faster than ingress and see if the excavator can get the tank out without having to dewater the tank pit entirely. The size of the tear across the bottom of the tank is so large that I am not very confident of being able to do this without pulling down the entire tank pit.

We will do everything within our power to complete this work and have no intention of pushing this out till spring of next year. I have reached out to Robert Andrew who is heading up the excavation work and will keep you posted on any updates to the schedule.

Thank you for your time and valuable input.

Robert

From: Drouare, Douglas [mailto:drouare.douglas@epa.gov]
Sent: Wednesday, December 07, 2016 9:51 AM
To: Robert Trump <rtrump@totalpetroleumservices.com>; Sac & Fox Truck Stop <sacfoxtsmgr@jbntelco.com>
Subject: RE: Powhattan Schedule [WARNING: SPF validation failed]
Importance: High

Had a couple of vacation days and am now catching up on e-mails.

The proposal looks reasonable to us. Can you provide further explanation of your concerns regarding performing the soil vapor monitoring before the contaminated backfill and water is removed?

Regarding weather conditions ... having spent 20+ in the field working on LUST sites in Michigan I can understand the effects of cold weather. We can understand brief delays due to weather conditions. However, we do not expect the

responsible party to give up on efforts for the entire winter. You will just need to play the weather guessing game and hunt and pick for days that allow you to get the work done.

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From: Robert Trump [<mailto:rtrump@totalpetroleumservices.com>]
Sent: Wednesday, December 07, 2016 9:16 AM
To: Sac & Fox Truck Stop <sacfoxtsmgr@jbntelco.com>
Cc: robwandrew@mac-const.com; Chris Kinn <ckinn@terranext.net>; Chris VanMeerhaeghe <chris@rwtcompany.com>; Drouare, Douglas <drouare.douglas@epa.gov>; Anita Ketola <Anita.Ketola@anteagroup.com>; Kelly Cratsenburg <Kelly.Cratsenburg@anteagroup.com>
Subject: Powhattan Schedule [WARNING: SPF validation failed]

Good Morning All,

I have been watching the weather forecast and it has been steadily declining this week. After speaking to Teresa yesterday, I learned that the new tanks won't be installed at this time. However, removing the old tanks is still a pressing objective.

This poses a problem from the perspective of water handling when temperatures are below freezing. I have worked on many projects where we encounter cold temperatures and it is really a challenge and in some instances almost impossible to keep equipment and lines from freezing. We have resorted to putting pumps inside the cabs of trucks with lines running into and out the other side with the heaters on high just to keep a pump from freezing. I can tell you this is not fun and it is not very productive.

We have heaters which we can put in the frac tank and electrically keep the water temperature above freezing. However, we have also had instances where someone unplugged the electrical cords or a heater failed and we had a huge block of ice remaining in a steel tank that took weeks of blowing space heaters inside when outdoor temps were above 32 F to get the liquid out of the tanks. We have to be careful that no free product is in the mix or this becomes a volatility issue with electricity within a hazardous space.

I say all of this so everyone understands that water is a real challenge when temperatures are below freezing. My experience at this site being in an open area with no city buildings surrounding it makes for strong winds and no building cover to provide some increase in temperatures during cold weather.

So.....I don't want to be the fly in the ointment but from what I see we are very limited for the rest of December in the days we have to successfully remove and haul water from this site in conjunction with the tank pull.

Given the fact that new tanks will not be installed at this time I don't believe it necessary to attempt to dispose of any back fill materials or conduct the back fill monitoring to determine what back fill is to be hauled to the landfill. This can limit the volume of water to be handled at this time. Without proper removal of contaminated soil and water it is not recommended we attempt to conduct the soil vapor monitoring until such time as the remaining contaminated back fill and water is removed or can be tested by PID when the new tanks are to be installed.

Without the proper removal this will push the Soil Vapor Monitoring out further unless Doug Drouare, EPA region 7 has other thoughts regarding Soil Vapor Monitoring as requested in an earlier email. We will wait to hear what Mr. Drouare has to say and respond accordingly.

The primary focus is to get the damaged tank empty enough to allow for the excavator to raise the tank and allow the balance of water in it to run back into the pit. Once this pit is open any pooled water will prevent us from conducting the proper examination of the back fill from an environmental standpoint and it will most likely freeze over due to low temperatures.

Robert Andrew: How much water needs to be removed from the existing damaged tank (which is full at this time) to allow the excavator to hook and pull the tank up allowing any remaining water to fall back into the pit?

How much time is necessary to allow the excavator to open up everything around the tank so if water weight is sufficiently removed he can get the tank up?

Given the attached forecast it would appear we have a day this Saturday but next week is very cold.

It appears the following week Sunday through Wednesday would be the best for handling waters.

Can I get feedback from everyone and can we agree to pushing this to the week of the 18th? Understanding things have a way of changing here in the Midwest and quite rapidly.

Thanks,

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